

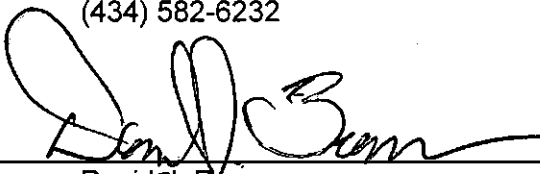
COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Intertape Polymer Corporation
1101 Eagle Springs Road - Danville, Virginia
Permit No. BRRO-30823

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Intertape Polymer Corporation has applied for a Title V Operating Permit for its Danville facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:  Date: August 10, 2010
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David J. Brown

Regional Director:  Date: August 10, 2010
Robert J. Weld

FACILITY INFORMATION

Permittee

Intertape Polymer Corporation
1101 Eagle Springs Road
Danville, VA 24540

Facility

Intertape Polymer Corporation
1101 Eagle Springs Road
Danville, VA 24540

County-Plant Identification Number: 51- 143-00109

SOURCE DESCRIPTION

NAICS Code: 326113 - Unsupported plastics film and sheet

Intertape Polymer Corporation is a manufacturer of polypropylene based adhesive tape and polyethylene based stretch film. The production of the adhesive tape begins with the extrusion of compounded polypropylene pellets into a "film." This film is then coated with adhesive and a release agent on one of two "coating lines" and wound on to rolls. After slitting to size, the adhesive tape is packaged for shipment. The two coating lines are the "hot melt" line and the "acrylic" line and both are subject to NSPS Subpart RR, Pressure Sensitive Tape and Label Surface Coating, and MACT Subpart JJJJ, Paper and Other Web Coating. The production of the stretch film begins with extrusion of the polyethylene pellets into a film which is then slit to size and packaged for shipment.

Neither of the two toluene storage tanks, nor the Polybutene storage tank are subject to NSPS Subpart Kb because they are below the exemption level of 75 cubic meters (19,815 gallons). Neither of the two 25,000 gallon resin storage tanks is subject to NSPS Subpart Kb because the indicated vapor pressure of the stored material is less than the applicability threshold of 15 kPa (2.18 psi).

With a potential-to-emit (PTE) of 241 tons of toluene per year, the facility is a Title V major source of Volatile Organic Compounds (VOC), and for Hazardous Air Pollutants (HAPs). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a NSR Permit issued on March 10, 2000, and is currently operating under the Title V permitted with an expiration date of August 11, 2010.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit on November 17, 2008, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

See Section II of permit.

Notes:

The rated capacity for the hot melt line listed in the current permit application (0.346 tons/hr) has increased over that shown in the 2000 Title V permit (0.167 tons/hr). However, both values are less than the rated capacity based on the underlying NSR permit which is the basis of the applicable requirements for this coating line (ie., 800 m/min, 2.2 wide, and 3.5 grams coating / m² ~ 0.407 tons/hr). Therefore, this capacity is changed to match the NSR value. Similarly, the listed capacity of the compounding equipment for the hot melt line has increased from 1 ton/hr to 2 ton/hr. The new rated capacity is not considered in excess of the NSR the capacity considered during the NSR review.

EMISSIONS INVENTORY

A copy of the 2009 annual emission update is attached. Emissions are summarized in the following tables.

2009 Actual Emissions

	2009 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	78.4	3.3	0.02	7.0	3.9

2009 Facility Hazardous Air Pollutant Emissions

Pollutant	2009 Hazardous Air Pollutant Emission in Tons/Yr
Toluene	74.7

EMISSION UNIT APPLICABLE REQUIREMENTS - adhesive coating lines, #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P)

Limitations

Conditions III.A.2, III.A.3, and III.A.10 in the current Title V permit renewal are the state BACT requirements from Conditions 4, 5, and 17 of the Minor NSR Permit issued on March 10, 2000.

Condition III.A.11 in the current Title V permit renewal is the state compliance requirement from Condition 18 of the Minor NSR Permit issued on March 10, 2000.

Conditions III.A.1, and III.A.4 through III.A.9 in the current Title V permit renewal are limitation-type requirements from Conditions 3, and 10 through 14, of the Minor NSR Permit issued on March 10, 2000. These NSR conditions implement the requirements of 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, for the facility's two coating lines.

Condition III.A.12 in the current Title V permit renewal references section IV in the renewal permit. Section IV implements the requirements of 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating as promulgated on December 4, 2002. (Note: The Subpart JJJJ requirements for capture systems are not considered applicable to this facility because the solvent recovery system uses liquid-liquid material balance to demonstrate compliance.)

Monitoring

Conditions III.B.1 through III.B.3 in the current Title V permit renewal are monitoring-type requirements from Conditions 6, 20, and 25 of the Minor NSR Permit issued on March 10, 2000. These NSR conditions are based on the state standards for granting permits.

Condition III.B.4 in the current Title V permit renewal references section IV in the renewal permit. Section IV implements the requirements of 40 CFR 63, Subpart JJJJ.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the following:

Condition III.C.1 in the current Title V permit renewal are recordkeeping-type requirements from Condition 21 of the Minor NSR Permit issued on March 10, 2000. This NSR condition implements the requirements of 40 CFR 60, Subpart RR.

Condition III.C.2 in the current Title V permit renewal references section IV in the renewal permit. Section IV implements the requirements of 40 CFR 63, Subpart JJJJ.

Testing

Condition III.D.1 in the current Title V permit renewal is the state performance testing requirement from Condition 7 of the Minor NSR Permit issued on March 10, 2000.

Conditions III.D.2 in the current Title V permit renewal are testing-type requirements from Condition 9 of the Minor NSR Permit issued on March 10, 2000. This NSR condition implements the requirements of 40 CFR 60, Subpart RR.

Condition III.D.3 in the current renewal Title V permit references section IV in the renewal permit. Section IV implements the requirements of 40 CFR 63, Subpart JJJJ

Reporting

Condition III.E.1 in the current renewal Title V permit is the reporting-type requirement from Condition 16 of the Minor NSR Permit issued on March 10, 2000. This NSR condition implements the requirements of 40 CFR 60, Subpart RR.

Condition III.E.2 in the current renewal Title V permit references section IV in the renewal permit. Section IV implements the requirements of 40 CFR 63, Subpart JJJJ.

See additional discussion in INAPPLICABLE REQUIREMENTS section below.

Compliance Assurance Monitoring (CAM)

Generally, the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM) apply to each emissions unit meeting all of the following criteria at a major source required to obtain a Title V permit:

- The unit emits or has the potential to emit (in the absence of add-on control devices) quantities of one or more regulated air pollutants that exceed major source thresholds,
- The unit is subject to one or more emission limitations for the regulated air pollutants for which it is major before control, and
- The unit uses a control device to achieve compliance with one or more of these emission limitations.

The (2) coating lines at Intertape fulfill all three criteria and therefore, would apparently be subject to CAM for toluene and for VOC. However, 40 CFR 64.2(b) lists several specific exemptions to the CAM rule. Per 64.2(b) affected facilities subject to a national emission standard for hazardous air pollutants (NESHAP) proposed after November 15, 1990 are exempt. Therefore, since the coating lines are subject to 40 CFR 63, Subpart JJJJ, which was proposed on September 13, 2000, they are exempt from CAM requirements for toluene.

In a similar fashion, since the VOC emissions limited in the Title V permit are the toluene emissions, the monitoring requirements included in Subpart JJJJ are considered equivalent to CAM.

Streamlined Requirements

The facility obtained a NSR permit to modify on March 10, 2000. The 2000 NSR permit carried forward the initial performance requirement for the superseded April 23, 1999 NSR permit. The report for the inspection performed on April 7, 2000 indicates that the initial performance tests for the modification have been completed. For this NSPS Subpart RR affected facility, the required performance test uses one month of collected data rather than the average of three runs as specified in 40 CFR 60.8(f). The report of the inspection included a copy of this data. Therefore, the NSR applicable requirements related to these initial performance tests are not

included in the current Title V permit renewal.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Note: This permit renewal uses the currently approved version of the general conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2006".

This general condition cites the Articles that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications
Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications
Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

None at this time.

INAPPLICABLE REQUIREMENTS

In accordance with 40 CFR 63.2435(c)(3) – affiliated operations, the provisions of 40 CFR 63, Subpart FFFF, Miscellaneous Organic Chemical Production and Processes do not apply to the affiliated operations at facilities subject to 40 CFR 63, Subpart JJJJ. Subpart FFFF states that “Affiliated operations include, but are not limited to, mixing or dissolving of coating ingredients; coating mixing for viscosity adjustment, color tint of additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and storage of coatings and solvent; and conveyance and treatment of wastewater.” Therefore, this Intertape facility is not subject to the provisions of Subpart FFFF.

Similarly, in accordance with per 40 CFR 63.7985(d)(2) – affiliated operations, the provisions of 40 CFR 63, Subpart HHHHH, Miscellaneous Coating Manufacturing do not apply to the affiliated operations at this facility. Subpart uses the same description of affiliated operations as Subpart FFFF.

COMPLIANCE PLAN

None at this time.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

See Section V for insignificant emission units

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

Note: Cast extruder 20P was removed from the current renewal permit. It was never installed.

CONFIDENTIAL INFORMATION

No information claimed to be confidential.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the The Danville Register & Bee from May 13, 2010 to June 12, 2010.